



**ADVANCED**TECHNOLOGIES

## **ELE Advanced Technologies Ethical behaviour and Code of Conduct**

**This Policy has been implemented to cover:**

1. Ethics and Business Conduct
2. Code of Conduct
3. Anti-Corruption
4. Harassment

### **1. Ethics and Business Conduct**

ELE Advanced Technologies will conduct business fairly, impartially and with compliance to all applicable laws and regulations.

ELE Advanced Technologies is committed to integrity, honesty and respect for others in all its business relationships; amongst suppliers, customers, communities and its employees. A high standard of ethical behaviour is expected from all employees, both in their professional and personal conduct.

A Code of Conduct has been implemented by the Board of Directors to guide the conduct of our business, the people who work for our business and for those with whom we work.

ELE Advanced Technologies will:

- Provide awareness training for all employees,
- Provide a copy of the policies when recruiting new team members,
- Provide a point of contact to report ethical concerns,
- Review this policy once a year at the Board and highlight key messages.

### **2. Code of Conduct**

ELE Advanced Technologies believes in 'doing the right thing' and 'doing things right'. While this policy can not cover every eventuality, it should provide guidance on where to seek advice and how to act.

All employees and those who act on behalf of ELE Advanced Technologies should:

- Review the Code of Conduct every year,
- Participate in all training and engage in the learning process,
- Report Code violations to the SLC or dedicated point of contact,
- Raise concerns and escalate as appropriate via line leaders or the Site Ethics Co-ordinator,
- Not investigate situations or implicate themselves in situations that may bring ELE Advanced Technologies' reputation into question,
- Not involve themselves in conflicts of interest,
- Should not seek personal gain from intellectual property or confidential information
- Always Understand and adhere to the Anti-Corruption Policy.

ELE Advanced Technologies expects to:

- Inform employees of all relevant policies associated with ELE Advanced Technologies,
- Provide employees with training regarding business practices and policies,
- Allow a work environment where employees feel empowered to raise concerns or suspected violations without retaliation,



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- Provide a point of contact (Site Ethics Co-ordinator) to report questions or concerns about possible violations and obtain guidance on courses of action.
- Provide a safe working environment and protect all employees and stakeholders from the consequences of alcohol, drugs and substance abuse.
- Monitor compliance with this Code.

In enforcing the Code, violations may be subject to disciplinary action, including, in serious cases, termination of employment. Statutory employment rights will be honoured.

Questions or concerns regarding the Code can be addressed through your line leader, the Finance Director or the CEO.

Manesh Pandya  
CEO  
31<sup>st</sup> January 2020

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### 3. Anti-Corruption Policy

- **Gifts and entertainment**

Anything given or received as a result of a business relationship. Not limited to, but including dinner, tickets to events, travel etc. Any gifts of a nominal value (up to £50.00) may be accepted but should be handed over to the Finance Director with details of who provided the gift and under what circumstances. Those involved in negotiating contracts or concessions should avoid favouritism or unfair dealings. Gifting by an ELE Advanced Technologies employee should be authorised by the Managing Director to ensure there is no appearance of unfair dealings.

- **Conflicts of Interest**

Occurs when an employee's personal, social, financial or political activity interfere, or potentially interfere with their objectivity towards ELE Advanced Technologies. These should be avoided as they can be harmful. Not limited to, but including, second job, holding financial interest in supplier/customer, serving as a director or consultant, benefiting a relative/friend etc. Should you encounter a personal conflict, you should declare the dealing to your line manager.

- **Competition and Anti-trust**

ELE Advanced Technologies adheres to 'competition' laws, otherwise known as 'anti-trust' laws, designed to promote free and fair competition around the world. It prohibits price-fixing, collusion and conspiracies and unlawfully obtaining information about competitors. Laws can apply outside of the country's borders that we operate and should therefore be avoided. Violations may incur business fines of up to 10% turnover, as well as individuals being subjected to prison sentences and substantial fines.

- **Money laundering**

Is the process by which individuals and entities try to conceal illicit funds, or otherwise make these funds look legitimate? ELE Advanced Technologies will not tolerate this behaviour. Few employees will be able to infringe these laws however consideration is required when dealing with customers, suppliers and intermediaries who appear to operate with a lack of integrity. Irregularities in payments such as overpayments, paying in a different currency or into another bank account not originally listed.

- **Sales representatives**

An individual or established legal entity performing services in good faith for the purpose of securing business for ELE Advanced Technologies. Sales Representatives are independent contractors and should therefore not operate under the ELE Advanced Technologies name as this could imply that they are employees of ELE Advanced Technologies.

ELE Advanced Technologies may engage a Sales Representative to pursue business opportunities effectively, based on sound business judgement, considering the legislations and business conditions in a country. Sales Representatives must avoid practices which are unlawful, improper or unethical, and conduct themselves in a manner that avoids the appearance of impropriety or which could cause embarrassment to ELE Advanced Technologies. Before engaging a Sales Representative, ELE Advanced Technologies will ensure the potential Sales Representative signs up to this document and fully understands their need to comply. Commission paid to a sales representative shall not exceed 10%.

- **Political Contributors and lobbying activities**

ELE Advanced Technologies will not participate directly in party political activity and will make no political contributions whether in cash or in kind, anywhere in the world. Employees have the right to participate in the political process however they should make it clear they do not



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represent ELE Advanced Technologies when they participate. Employees will not use Company time, property or equipment to support personal political activities, will always make clear views and actions are their own and will seek the approval of the Board should they plan to seek or accept public office.

ELE Advanced Technologies may participate in debates on subjects of concern to ELE Advanced Technologies, its staff and communities in which we operate. Legal advice should be sought before engaging.

### Breaches

Violations of this policy are punishable by disciplinary action up to and including termination of employment. Violations may also result in criminal prosecution of the individuals involved.

Violations should be reported to line managers in the first instance. If no resolve is given, reports should be made to the Finance Director who will be responsible for escalating appropriately. Anyone making such reports will be protected from punishment or retaliation in accordance with the above.

A handwritten signature in black ink, appearing to read 'Manesh Pandya', with a small dot at the end.

Manesh Pandya  
CEO  
31<sup>st</sup> January 2020



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#### **4. Harassment**

ELE Advanced Technologies will not tolerate any form of harassment or bullying.

The purpose of this policy is to inform employees of the type of behaviour that is totally unacceptable and to explain what solutions there are to employees who may suffer harassment or bullying.

ELE Advanced Technologies intends to provide a neutral working environment in which no one feels threatened or intimidated.

Harassment is a discriminatory act and is also a criminal offence. It is very difficult to define as it can take many forms, but in the main it takes the form of unwanted behaviour by one employee towards another, for example:

- Patronising or belittling comments.
- Comments about appearance/body/clothes.
- Leering or staring at a person's body.
- Unwelcome sexual invitations or pressure.
- Promises or threats, concerning employment or conditions, in exchange for sexual favours.
- Displaying offensive or sexually explicit material.
- Touching, caressing, hugging or indecent assault.

Please remember the test is that the behaviour is UNWELCOME, UNINVITED AND UNRECIPROCATED.

Bullying is also difficult to define. Obvious examples are:

- Threats of or actual physical violence.
- Unpleasant or over repeated jokes about a person.
- Unfair or impractical work loading.

#### **Procedure**

If you encounter a problem of this nature, it is vital that you make the person responsible aware that his/her remarks or conduct are offensive to you. This should be done in a simple, straightforward way.



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It is recognised that complaints of harassment or bullying are often of a sensitive or worrying nature and that it may be difficult to speak directly to the other employee involved. If this is the case, you should put your request in writing and hand it to the harasser or bully.

When or if the informal approach fails or if you believe that the harassment or bullying is of a very serious nature you must bring the matter to the attention of a Senior Manager. If possible, you should keep notes of the harassment or bullying so that the formal complaint can be investigated, including the date, time and whereabouts of the act.

If you make a formal complaint it will be dealt with under the grievance procedure and all possible actions will be taken to separate you from the alleged harasser or bully.

If you bring a complaint of harassment or bullying, you will not be victimised for having brought the complaint. However, following a full investigation, if ELE Advanced Technologies has grounds to believe that the complaint was brought with malicious intent, you will be subject to disciplinary action under ELE Advanced Technologies' disciplinary procedure.

ELE Advanced Technologies' appeal procedures apply to appeals against decisions made under the equal opportunities and discrimination policy and the harassment policy.

A handwritten signature in black ink, appearing to read 'Manesh Pandya', with a stylized, cursive script.

Manesh Pandya  
CEO  
31<sup>st</sup> January 2020

## **Modern Slavery Statement 2020**

### **Introduction**

This Modern Slavery Statement relates to actions and activities during the financial year 1st January- 31st December 2020.

The statement sets out the Company's commitment to preventing slavery and human trafficking in our business activities, and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Employees are expected to report their concerns, and management to act upon them.

### **Organisational Structure**

This statement covers the business activities of ELE Advanced Technologies Ltd

The Company operates predominantly in the UK. Suppliers from which material is purchased are based in the UK and worldwide, the majority of which are not considered to be at high risk of modern slavery or human trafficking. A register of such countries is maintained centrally and updated on an annual basis as part of our Bribery and Corruption audit.

### **High Risk Areas**

The Company does not consider its activities to be at high risk of modern slavery or human trafficking.

### **Our Suppliers**

The following are the ways the Company assesses whether activities or countries are high risk in relation to modern slavery or human trafficking:

An analysis of high-risk suppliers/countries is undertaken as part of the Company's anti-bribery and corruption audit.

Responsibility for the Company's anti-slavery initiatives is as follows:

- 1.1 Policy: David Stanley, Company Secretary, is responsible for creating and reviewing policies. The process by which policies are developed is by considering best practice, consulting with colleagues, customers and suppliers and adapting to the needs of the Company.
- 1.2 Managers are responsible for completing the annual anti-bribery and corruption audit and bringing to the Company Secretary's attention any supplier or country that may be at risk in relation to modern slavery or human trafficking.

### **Training**

Since the industry in which we operate is considered low risk in relation to



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modern slavery or human trafficking, no training has been undertaken other than making this Statement available to employees and suppliers. We do, however, review the requirement on an annual basis.

### **Policies**

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business, or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies strengthen our commitment to the practice of responsible corporate behavior:

- 1 Ethics and Business Conduct
- 2 Code of Conduct
- 3 Anti-Corruption
- 4 Harassment

### **Due Diligence Processes for Slavery and Human Trafficking**

The Company undertakes due diligence when considering new suppliers, encourages long-standing relationships, and makes clear our commitment to responsible corporate behavior in all business activities.

We would consider invoking sanctions against suppliers that fail to improve their performance in line with expected standards.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary.

**Signed:**

**David Stanley**  
**Company Secretary**

**Date:** 31<sup>st</sup> January 2020